



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 23 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Alan Taylor, Ph.D.
Director, Product Safety and Regulatory Affairs
Crompton Corporation
199 Benson Road
Middlebury, Connecticut 06749

Dear Dr. Taylor:

Thank you for your letter dated July 1, 2004 to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program.

Your letter states that Crompton is the sole manufacturer of Phenol, styrenated (CAS No. 61788-44-1), that Crompton will no longer import or produce this chemical, and that the chemical should be removed from EPA's HPV Challenge Program Chemical List.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website (www.epa.gov/chemrtk) in March 1999. Among the prerequisites to be considered for removing a chemical from the HPV Challenge Program is that the chemical does not meet Inventory Update Rule (IUR) reporting requirements for the two most recent reporting years, in this case 1998 and 2002. Based on our review of pertinent IUR reporting data for these years, EPA has determined that Phenol, styrenated (CAS No. 61788-44-1) **does not meet** the no longer HPV criteria. Several other companies reported this chemical in both 1998 and 2002 in volumes above the equal to or greater than 1 million pounds per year threshold.

We will post this letter, accompanied by our reply, on the ChemRTK website as soon as possible as a means of advising the public that Crompton no longer manufactures or imports this chemical. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge

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Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsc-hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201